IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA HARRISONBURG DIVISION

UNITED STATES OF AMERICA)
V.) Case No. 5:23-cr-00006-001
HECTOR MANUEL ESPINOSA)

GOVERNMENT'S NOTICE OF EXPERT WITNESS LISA FRANK

The United States of America submits the following notice pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G) regarding expert testimony.

The Government intends to call Lisa Frank, Forensic Scientist, at the Virginia Department of Forensic Science, Northern Laboratory Controlled Substance Section.

The government provides the following information pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G), and Federal Rules of Evidence 702, 703, and 705 (Attachment A, Parts I and II):

- 1. a complete statement of all opinions that the government will elicit from the witness in its case-in-chief, or during its rebuttal to counter testimony that the defendant has timely disclosed under (b)(1)(C);
 - 2. the bases and reasons for them;
- 3. the witness's qualifications, including a list of all publications authored in the previous 10 years; and
- 4. a list of all other cases in which, during the previous 4 years, the witness has testified as an expert at trial or by deposition.

Attachment A, Part I, which is Lisa Franks' Statement of Qualifications, details her

professional experience, education, training, and professional affiliations.

Date: August 15, 2024 Respectfully submitted,

CHRISTOPHER R. KAVANAUGH UNITED STATES ATTORNEY

/s/ Ronald M. Huber

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Use of Expert Witnesses has been provided via electronic means via the Court's CM/ECF filing system to counsel for the defendants, this 15th day of August 2024.

/s/Ronald M. Huber
Assistant United States Attorney